# **Section 1. Registration Information**

### Source Identification

Facility Name:

Flavor Right Foods Group, Inc.

Parent Company #1 Name: Parent Company #2 Name:

## Submission and Acceptance

Submission Type: First-time submission

Subsequent RMP Submission Reason:

Description:

Receipt Date:13-Oct-2010Postmark Date:13-Oct-2010Next Due Date:13-Oct-2015Completeness Check Date:13-Oct-2010

Complete RMP: Yes

De-Registration / Closed Reason:

De-Registration / Closed Reason Other Text:

De-Registered / Closed Date:

De-Registered / Closed Effective Date:

Certification Received: Yes

## **Facility Identification**

EPA Facility Identifier:

1000 0021 2478

Other EPA Systems Facility ID:

## Dun and Bradstreet Numbers (DUNS)

Facility DUNS:

35907658

Parent Company #1 DUNS: Parent Company #2 DUNS:

## **Facility Location Address**

Street 1:

1910 W Mountain View Rd.

Street 2:

City: Phoenix
State: ARIZONA
ZIP: 85021

ZIP4:

County: MARICOPA

## Facility Latitude and Longitude

Latitude (decimal): 33.343139

Longitude (decimal): -112.060527

Lat/Long Method: GPS - Unspecified 
Lat/Long Description: Air Release Vent

Horizontal Accuracy Measure:

Horizontal Reference Datum Name: North American Datum of 1983

Source Map Scale Number:

Owner or Operator

Operator Name: Flavor Right Foods Group, Inc.

Operator Phone: (602) 232-2570

**Mailing Address** 

Operator Street 1: 2517 East Chambers Street

Operator Street 2:

Operator City: Phoenix
Operator State: ARIZONA
Operator ZIP: 85040

Operator ZIP4:

Operator Foreign State or Province:

Operator Foreign ZIP: Operator Foreign Country:

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person: Calvin R. Warf RMP Title of Person or Position: Vice President

RMP E-mail Address: rwarf@flavorrightfoods.com

**Emergency Contact** 

Emergency Contact Name: Ryan Davis

Emergency Contact Title: Maintenance Supervisor

Emergency Contact Phone: (602) 232-2570 Emergency Contact 24-Hour Phone: (520) 483-3946

Emergency Contact Ext. or PIN:

Emergency Contact E-mail Address: rdavis@flavorrightfoods.com

Other Points of Contact

Facility or Parent Company E-mail Address:

Facility Public Contact Phone:

Facility or Parent Company WWW Homepage

Address:

(602) 997-1267

**Local Emergency Planning Committee** 

LEPC: Maricopa County LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site: 4

FTE Claimed as CBI:

Covered By

OSHA PSM: Yes EPCRA 302: Yes

CAA Title V:

Air Operating Permit ID:

Plan Sequence Number: 1000015979

## **OSHA** Ranking

OSHA Star or Merit Ranking:

## Last Safety Inspection

Last Safety Inspection (By an External Agency)

Date:

Last Safety Inspection Performed By an External

Agency:

08-Sep-2010

Fire Department

## **Predictive Filing**

Did this RMP involve predictive filing?:

## **Preparer Information**

Preparer Name: Jason E. Krantz
Preparer Phone: (480) 748-1574

Preparer Street 1: 2517 East Chambers Street

Preparer Street 2:

Preparer City: Phoenix
Preparer State: ARIZONA
Preparer ZIP: 85040
Preparer ZIP4:

Preparer Foreign State: Preparer Foreign Country: Preparer Foreign ZIP:

## Confidential Business Information (CBI)

CBI Claimed:

Substantiation Provided: Unsanitized RMP Provided:

## Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine

if there were any accidents reported for this RMP.

## **Process Chemicals**

Process ID: 1000019967

Description: Ammonia Refrigeration

Process Chemical ID: 1000024350

Program Level: Program Level 3 process
Chemical Name: Ammonia (anhydrous)

CAS Number: 7664-41-7

Quantity (lbs): 13500

CBI Claimed:

Flammable/Toxic: Toxic

## **Process NAICS**

Process ID: 1000019967
Process NAICS ID: 1000020336

Program Level: Program Level 3 process

NAICS Code: 31193

NAICS Description: Flavoring Syrup and Concentrate Manufacturing

## **Section 2. Toxics: Worst Case**

Toxic Worst ID: 1000016915

Percent Weight: 100.0

Physical State: Gas liquified by pressure Model Used: EPA's RMP\*Comp(TM)

Release Duration (mins): 10
Wind Speed (m/sec): 1.5
Atmospheric Stability Class: F
Topography: Urban

## **Passive Mitigation Considered**

Dikes:

Enclosures: Yes

Berms:
Drains:
Sumps:
Other Type:

## **Section 3. Toxics: Alternative Release**

Toxic Alter ID: 1000018464

Percent Weight: 100.0

Physical State: Gas liquified by pressure Model Used: EPA's RMP\*Comp(TM)

Wind Speed (m/sec): 3.0
Atmospheric Stability Class: D
Topography: Urban

**Passive Mitigation Considered** 

Dikes:

Enclosures: Yes

Berms:
Drains:
Sumps:
Other Type:

**Active Mitigation Considered** 

Sprinkler System:
Deluge System:
Water Curtain:
Neutralization:
Excess Flow Valve:

Flares: Scrubbers:

Emergency Shutdown: Yes

Other Type:

Plan Sequence Number: 1000015979

# **Section 4. Flammables: Worst Case**

No records found.

Plan Sequence Number: 1000015979

# **Section 5. Flammables: Alternative Release**

No records found.

Plan Sequence Number: 1000015979

# **Section 6. Accident History**

No records found.

# **Section 7. Program Level 3**

## Description

Ammonia Refrigeration System ¿ General Prevention

#### General Safety

Flavor Right helps prevent releases from the Ammonia Refrigeration System through general safety as follows:

¿ Gauges and valves installed at all vessels, equipment, and controls.

¿ All accumulators and intercoolers equipped with high level float switches that sound a high liquid alarm level and shut down compressors when high liquid level detected.

¿ Main liquid king valve shut off valves are prominently identified with signs.

¿ Oil drain valves are self-closing.

¿ There is signage at the Ammonia Refrigeration Building prominently displaying:

- o Name, address and telephone of installing and servicing contractor
- o Approximate quantity of ammonia
- o Lubricant type and amount
- o Field test pressure
- o Emergency instructions, emergency phone numbers, and emergency contacts
- ¿ Ammonia Refrigeration Building floor is free of oil, grease, and water.
- ¿ Aisles in the Ammonia Refrigeration Building are clear of obstructions.
- ¿ Personnel can exit quickly and safely in the event of a leak.
- ¿ There is more than one exit from the Ammonia Refrigeration Building to the outdoors.
- ¿ The exits are clear of piping and other obstructions.
- ¿ The ammonia refrigeration system is currently free of leaks.
- ¿ The ammonia refrigeration system is free of abnormal sounds, vibrations, and pulsations.
- ¿ There is an emergency shower and eyewash available.
- Å¿. There are covers securely fastened to all electrical panels and junction boxes.
- ¿ A maintenance and repair log, including oil management maintained.
- ¿ A thorough formal inspection of the ammonia refrigeration system by a competent professional engineer specializing in ammonia refrigeration systems completed.
- ¿, Several thorough formal inspections of the ammonia refrigeration system by the local fire department completed.
- ¿ Ammonia Refrigeration Building and Mezzanine is secure and access is restricted to authorized personnel.
- ¿ Vent lines from pressure relief valve s extend to a large water diffusion tank.

#### **General Comments**

The ammonia refrigeration system received updates in accordance with current codes and standards in 2010. The local fire department conducted several inspections during the 2010 update process to ensure the company engineered appropriate safeguards into the system. A professional engineer specializing in ammonia refrigeration systems completed a complete mechanical integrity study on the ammonia refrigeration system.

New instrumentation controls and monitors the ammonia refrigeration system. The company updated the ammonia refrigeration system with ammonia detection systems, including visual/audible alarms. All equipment pressure-relief valves are new installed 2010. The company utilizes a continuous flow ventilation fan. Emergency exhaust ventilation is available for emergency events. Process equipment operates within design limits and is in good clean condition. There is not excessive dirt, scale, or ice built up around the system. The company secured equipment so it does not exhibit excessive vibration.

Administrative controls as described below are in place to help prevent and mitigate releases.

Ammonia Refrigeration System - Equipment General Prevention

Ammonia Detection System (2010 Installation)

¿ Main Instrumentation Panel in Control Room of Ammonia Refrigeration Building

¿ Ammonia Sensors

o Ammonia Refrigeration Building: Machine Room; South Wall

o Ammonia Refrigeration Building: Machine Room; Vent Lines

o Warehouse Building: Cooler Area o Warehouse Building: Freezer Area

o Warehouse Building: Dock

¿ Detection Levels

o 25 ppm in Warehouse

o 50 ppm in Machine Room

¿ Detection Activators

o Warehouse: 25 ppm activates visual and audible alarms, and shuts off liquid to the affected zone area

o Machine Room: 50 ppm activates visual and audible alarms, and activates the vertical stack emergency ventilation roof fan

o Machine Room: 300 ppm shuts down all Machine Room equipment, and activates a alarm condition with the local fire department

#### Visual / Audible Alarm System (2010 Installation)

¿ Warehouse: Exterior Dock ¿ Warehouse: Interior Dock ¿ Warehouse: Freezer ¿ Warehouse: Staging ¿ Warehouse: Cooler

¿ Ammonia Refrigeration Building: Exterior; Southwest Corner ¿ Ammonia Refrigeration Building: Exterior; Northwest Corner

¿ Ammonia Refrigeration Building: Exterior; Outside of Control Room

#### Pressure Relief Valves

¿. Are replaced new in 2010

¿ Are suitable for ammonia

¿ Have proper relief setting

¿ Have required discharge capacity

¿ Have unbroken ASME seal

¿ Are installed per ANSI/IIAR-2

¿ Are connected above the liquid levels

¿ Include inlet piping conforming to ANSI/IIAR-2

¿ Include discharge piping conforming to ANSI/IIAR-2

¿ Are piped to vent lines ending at a large water diffusion tank

¿ Are located out of refrigerated spaces

¿ DO NOT have stop valves installed in the pressure-relief inlets and outlets

#### Ventilation

¿ Continuous Flow Ventilation Fan at 2,000 CFM: Rooftop Vertical Exhaust

¿ Emergency Flow Ventilation Fan at 14,500 CFM: Rooftop Vertical Exhaust

¿ Emergency Fan Control Panel - Ammonia Refrigeration Building: Exterior; Northwest Corner

#### Ammonia Refrigeration System - Equipment Specific Prevention

#### Compressors

¿ Are suitable for ammonia

¿ Operate within design limits

¿ Are adequately anchored and supported

¿ Have safe access for service and maintenance

¿ Are free from excessive vibration

#### **Evaporative Condensers**

¿ Are clean with no corrosion

¿ Are suitable for ammonia

¿ Operate within design limits

¿ Are adequately anchored and supported

¿ Are free from excess, visible vibration

¿ Are adequately protected against traffic hazards

¿ Have purge valves in good condition

¿ Have auto refrigerated air purge installed

¿ Have condenser isolation valves in good condition

¿ Are without dust and scale buildup on the condenser coil, mist eliminators, and water sump

¿ Have water distributors that operate effectively

¿ Have mist eliminators that operate effectively

#### Air-Cooling Evaporators

¿ Are clean with no visible corrosion

¿ Are suitable for ammonia

¿ Operate within design limits

¿ Are adequately anchored and supported

¿ Are free from excessive vibration

¿ Is free of excessive ice buildup and clean of dirt

¿ Have drives properly guarded and protected

#### Piping

¿ Is adequately supported

¿ Is free of abnormal ice formations

¿ Have ammonia drain valves fitted with plugs

¿ Have gauge valves and gauges installed at control valves

¿ Have gauges in good working order

¿ Is marked in accordance with IIAR Bulletin 114

¿ Is installed in accordance with IIAR-2-1992 Section 5

¿ Have mechanical fasteners tight

#### Pressure Vessels

¿ Are operating within pressure and temperature limitations

¿ Are with ASME stamp visible

¿ Have manufacturer data reports on file

¿ Are without known alterations or modifications

¿ Have relief valves as indicated in the pressure relief valve section

¿ Are marked in accordance with IIAR Bulletin 114

¿ Without visible corrosion on pressure relief valves

Ammonia Refrigeration System - Administrative Prevention

#### **Process Safety Management**

Flavor Right developed a process safety management program for the ammonia refrigeration system. The process safety management program complies with the Occupational Safety and Health Administration (OSHA) Process Safety Management for Highly Hazardous Materials standard.

#### **Operating Procedures**

Operating procedures exist for the ammonia refrigeration system and applicable maintenance activities. A licensed refrigeration contractor familiar with ammonia refrigeration system provides 24-hour service and guidance.

## Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID: 1000020422

Chemical Name: Ammonia (anhydrous)

> Flammable/Toxic: Toxic 7664-41-7 CAS Number:

Prevention Program Level 3 ID: 1000016758 NAICS Code: 31193

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):

30-Sep-2010

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):

04-Aug-2010

The Technique Used

What If: Yes

Checklist:

What If/Checklist:

HAZOP:

Failure Mode and Effects Analysis:

Fault Tree Analysis: Other Technique Used:

PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):

Major Hazards Identified

Toxic Release: Yes

Fire:

Explosion:

Runaway Reaction: Polymerization:

Overpressurization: Yes Corrosion: Yes Overfilling: Yes

Contamination:

**Equipment Failure:** Yes Yes

Loss of Cooling, Heating, Electricity, Instrument Air:

Earthquake:

Floods (Flood Plain):

Tornado: Hurricanes:

Other Major Hazard Identified:

**Process Controls in Use** 

Vents: Yes Relief Valves: Yes Check Valves: Yes

Scrubbers: Flares:

Facility Name: Flavor Right Foods Group, Inc. EPA Facility Identifier: 1000 0021 2478 Plan Sequence Number: 1000015979 Manual Shutoffs: Yes Yes Automatic Shutoffs: Interlocks: Yes Alarms and Procedures: Yes **Keyed Bypass:** Emergency Air Supply: **Emergency Power:** Yes Backup Pump: Grounding Equipment: Inhibitor Addition: Rupture Disks: **Excess Flow Device:** Quench System: Purge System: None: Other Process Control in Use: Diffusion Tank with Water Mitigation Systems in Use Sprinkler System: Dikes: Fire Walls: Blast Walls: Deluge System: Water Curtain: Enclosure: Yes Neutralization: None: Other Mitigation System in Use: Continuous Flow Exhaust Fan, Emergency Flow Exhaust Fan Monitoring/Detection Systems in Use Process Area Detectors: Yes Perimeter Monitors: None: Other Monitoring/Detection System in Use: Changes Since Last PHA Update Reduction in Chemical Inventory: Increase in Chemical Inventory: Change Process Parameters: Installation of Process Controls: Yes Installation of Process Detection Systems: Installation of Perimeter Monitoring Systems: Installation of Mitigation Systems: None Recommended: None:

Installed pipe supports on piping at bottom of vessels to prevent damage resulting in a release

# Review of Operating Procedures

Other Changes Since Last PHA or PHA Update:

Facility Name: Flavor Right Foods Group, Inc.

EPA Facility Identifier: 1000 0021 2478 Plan Sequence Number: 1000015979

30-Sep-2010

Operating Procedures Revision Date (The date of the most recent review or revision of operating

procedures):

#### Training

Training Revision Date (The date of the most recent 30-Sep-2010 review or revision of training programs):

## The Type of Training Provided

Classroom: Yes On the Job: Yes

Other Training:

## The Type of Competency Testing Used

Written Tests: Yes
Oral Tests: Yes
Demonstration: Yes
Observation: Yes

Other Type of Competency Testing Used:

#### Maintenance

Maintenance Procedures Revision Date (The date of 30-Sep-2010 the most recent review or revision of maintenance procedures):

Equipment Inspection Date (The date of the most recent equipment inspection or test):

30-Aug-2010

Equipment Tested (Equipment most recently inspected or tested):

Mechanical integrity inspection and report completed on entire system

## Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):

Change Management Revision Date (The date of the most recent review or revision of management of change procedures):

30-Sep-2010

## **Pre-Startup Review**

Pre-Startup Review Date (The date of the most recent pre-startup review):

09-Aug-2010

## **Compliance Audits**

Compliance Audit Date (The date of the most recent compliance audit):

Plan Sequence Number: 1000015979

Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):

## Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):

Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):

## **Employee Participation Plans**

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):

30-Sep-2010

#### Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most 30-Sep-2010 recent review or revision of hot work permit procedures):

## **Contractor Safety Procedures**

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):

30-Sep-2010

Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):

#### **Confidential Business Information**

CBI Claimed:

Plan Sequence Number: 1000015979

# **Section 8. Program Level 2**

Plan Sequence Number: 1000015979

## **Section 9. Emergency Response**

## Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):

Facility Plan (Does facility have its own written emergency response plan?):

Yes

Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):

Yes

Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):

Yes

Healthcare (Does facility's ER plan include information on emergency health care?):

Yes

## **Emergency Response Review**

Review Date (Date of most recent review or update 30-Sep-2010 of facility's ER plan):

## **Emergency Response Training**

Training Date (Date of most recent review or update 09-Aug-2010 of facility's employees):

#### Local Agency

Agency Name (Name of local agency with which the Phoenix Fire Department facility ER plan or response activities are coordinated):

Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):

(602) 262-6297

Yes

## Subject to

OSHA Regulations at 29 CFR 1910.38: Yes
OSHA Regulations at 29 CFR 1910.120: Yes

Clean Water Regulations at 40 CFR 112:

RCRA Regulations at CFR 264, 265, and 279.52: OPA 90 Regulations at 40 CFR 112, 33 CFR 154,

49 CFR 194, or 30 CFR 254:

State EPCRA Rules or Laws:

Other (Specify):

# **Executive Summary**

Accidental Release Prevention and Emergency Response

Flavor Right Foods Group, Inc. desires to operate its ammonia refrigeration system without negative incidents that will affect its operation and surrounding community. The company will achieve this by ensuring the system design is by relevant standards and codes, and operated and maintained by competent service professionals or company personnel.

To help prevent and mitigate the results of negative incidents Flavor Right implemented results of mechanical integrity studies, process hazard analysis, local fire department involvement, and installation by a licensed contractor. However, the Flavor Right site incorporated specific emergency response actions into emergency action plans to account for the ammonia refrigeration system. The company referenced the International Institute of Ammonia Refrigeration (IIAR) and Occupational Safety and Health Administration (OSHA) for developing actions in case of a negative incident, and documented emergency response actions on the exterior of the ammonia refrigeration building, within the process safety management program, and within emergency response checklists.

Facility Description and Regulated Substances Used

Flavor Right Foods Group, Inc. occupies a warehouse type building for cold storage. The company stores concentrates and flavorings for desert fillings and toppings. Flavor Right uses an ammonia refrigeration system to maintain a cold dock, cooler, and freezer for receiving, storing, and shipping the food products.

The ammonia refrigeration system operates with approximately 13,500 pounds of ammonia, anhydrous. If a system operates at greater than 10,000 pounds, a company is responsible for developing a Process Safety Management program under OSHA and a Risk Management Plan (RMP) under the Environmental Protection Agency (EPA). These programs and plans help a company manage their risk of exposure to internal employees and the community.

The ammonia refrigeration system is a closed system and does not consume or emit ammonia. The process is such that the ammonia simply changes physical state between a gas and liquid to effectively cool spaces. There are not air emissions or water discharges from the process if the system when the system is operated and maintained appropriately.

General Release Prevention Program

The ammonia refrigeration system received updates in accordance with current codes and standards in 2010. The local fire department conducted several inspections during the 2010 update process to ensure the company engineered appropriate safeguards into the system. A professional engineer specializing in ammonia refrigeration systems completed a complete mechanical integrity study on the ammonia refrigeration system.

New instrumentation controls and monitors the ammonia refrigeration system. The company updated the ammonia refrigeration system with ammonia detection systems, including visual/audible alarms. All equipment pressure-relief valves are new installed 2010. The company utilizes a continuous flow ventilation fan. Emergency exhaust ventilation is available for emergency events.

Process equipment operates within design limits and is in good clean condition. There is not excessive dirt, scale, or ice built up around the system. The company secured equipment so it does not exhibit excessive vibration.

Administrative controls such as a Process Safety Management Program and Operating Procedures are in place to help prevent and mitigate releases. OSHA defines required Process Safety Management information and includes items like:

¿ Gathering and communicating process chemical information

¿ Documenting process technology information

¿ Documenting process equipment information

¿ Conducting process hazard analysis

¿ Ensuring and maintaining mechanical integrity of the system

¿ Developing and following operating procedures

¿ Conducting pre-startup review

¿ Process change management

¿ Compliance audits

¿ Hot work

¿ Training with proven competence

Five-Year Accident History

The previous owner of the ammonia refrigeration system experienced a negative incident requiring the local fire department to respond. The Flavor Right is not aware of additional factual data regarding the incident.

Flavor Right made significant improvements to the ammonia refrigeration system. The company has no incidents to report since they assumed ownership.

Elements of the Emergency Response Program

The key elements to the company's emergency response program are:

¿ Emergency instructions, phone numbers, and direct contacts posted on the exterior of the ammonia refrigeration building.

¿ Emergency Phone List incorporated into the PSM program listing Flavor Right emergency contacts, service contractor contacts, utility contacts, and local hospitals and occupational healthcare centers.

¿ Emergency Response Checklists describing evacuation and dealing with several common emergency events.

¿ The company designed the ammonia refrigeration system to shut down in the event that the ammonia detection system activates, and the system will activate emergency exhaust, and notify the local fire department.

Planned Changes to Improve Safety

Flavor Right implemented several upgrades to the ammonia refrigeration system in 2010. The company implemented critical findings discovered during the mechanical integrity study and process hazard analysis. Flavor right will continue to consider and/or implement additional findings to improve the safety of the ammonia refrigeration system.